

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

In re MOODY'S CORPORATION  
SECURITIES LITIGATION

No. 1:07-cv-8375-SWK  
(ECF)

**NOTICE OF LEAD PLAINTIFFS' MOTION  
FOR PARTIAL MODIFICATION OF THE PSLRA STAY**

**KIRBY McINERNEY, LLP**

Ira M. Press  
Roger W. Kirby  
Daniel Hume  
David Bishop  
825 Third Avenue, 16<sup>th</sup> floor  
New York, NY 10022  
Telephone: (212) 371-6600  
Facsimile: (212) 751-2540

**GLANCY BINKOW & GOLDBERG LLP**

Lionel Z. Glancy  
Michael Goldberg  
1801 Avenue of the Stars, Suite 311  
Los Angeles, California 90067  
Telephone: (310) 201-9150  
Facsimile: (310) 201-9160

and

Frederick W. Gerkens, III  
1430 Broadway, Suite 1603  
New York, New York 10018  
Telephone: (212) 382-2221  
Facsimile: (212) 382-3944

**SCHIFFRIN BARROWAY TOPAZ &  
KESSLER, LLP**

Michael K. Yarnoff  
Benjamin J. Hinerfeld  
Jennifer L. Keeney  
280 King of Prussia Road  
Radnor, PA 19087  
Telephone: (610) 667-7706  
Facsimile: (610) 667-7056

*Co-lead counsel for Lead Plaintiffs  
(additional counsel appears on signature page)*

**PLEASE TAKE NOTICE** that Lead Plaintiffs Teamsters Local 282 Pension Trust Fund, Charles W. McCurley, Jr. and Lewis Wetstein hereby move this Court before The Honorable Shirley W. Kram, Courtroom 15A, United States Courthouse, 500 Pearl Street, New York, NY 10007, for an order modifying the Private Securities Litigation Reform Act of 1995 (“PSLRA”) stay of discovery to obtain discovery that Moody’s already has provided to the Securities and Exchange Commission.

The motion will returnable at a date and time to be determined by the Court, and is based on this notice, the accompanying memorandum of law, affidavit of Ira M. Press and its exhibits, and all other proceedings had herein.

Dated: New York, New York  
September 4, 2008

**KIRBY McINERNEY, LLP**

By:       /s/ Ira M. Press        
Ira M. Press  
Roger W. Kirby  
Daniel Hume  
David Bishop  
825 Third Avenue, 16th Floor  
New York, New York 10022  
Tel: (212) 371-6600  
Fax: (212) 751-2540

Lionel Z. Glancy  
Michael Goldberg  
**GLANCY BINKOW & GOLDBERG LLP**  
1801 Avenue of the Stars, Suite 311  
Los Angeles, California 90067  
Tel: (310) 201-9150  
Fax: (310) 201-9160

- and -

Frederick W. Gerken, III  
1430 Broadway, Suite 1603  
New York, New York 10018  
Tel: (212) 382-2221  
Fax: (212) 382-3944

Michael K. Yarnoff  
Benjamin J. Hinerfeld  
Jennifer L. Keeney  
**SCHIFFRIN BARROWAY TOPAZ  
& KESSLER LLP**  
280 King of Prussia Rd.  
Radnor, PA 19087  
Tel.: (610) 667-7706  
Fax: (610) 667-7056

*Co-lead counsel for Lead Plaintiffs*

Christopher Keller  
Jonathan Gardner  
Serena Richardson  
**LABATON SUCHAROW LLP**  
140 Broadway  
New York, New York 10005  
Tel: (212) 907-0700  
Fax: (212) 818-0477